



MGM Brakes Superfund Site

United States Environmental Protection Agency •

Region 9 •

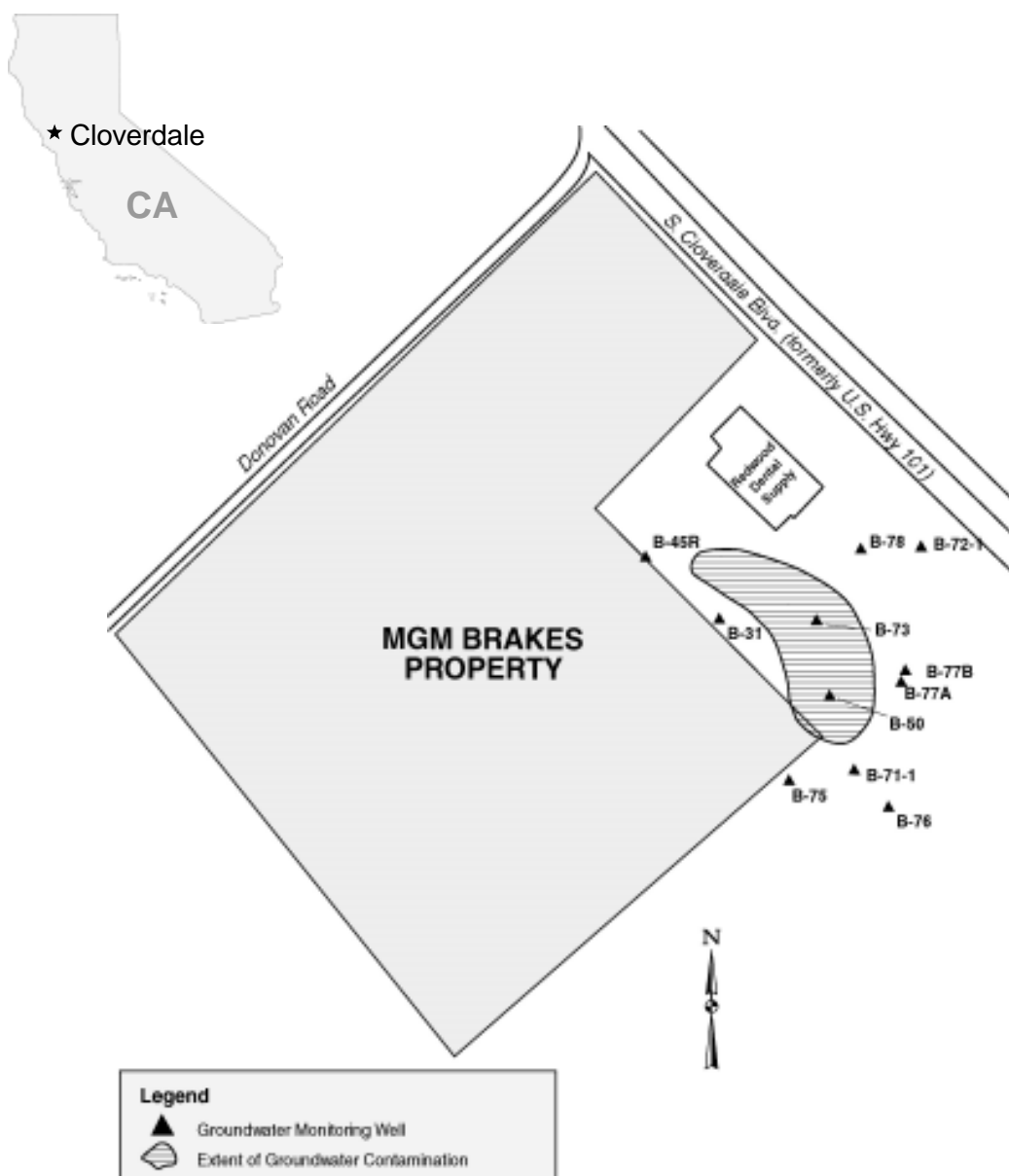
January 2004

FIVE-YEAR REVIEW FINDS MGM REMEDY PROTECTIVE

The United States Environmental Protection Agency (EPA) announces completion of the First Five-Year Review Report for the MGM Brakes Superfund site in Cloverdale, California. EPA's review finds that both soil and groundwater actions remain protective of human health and the environment because there is no exposure to site chemicals.

Under the Superfund law, EPA is required to review clean up actions every five years, whenever contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure. This fact sheet summarizes the findings of the Five-Year Review and describes how to obtain a copy of the report.

Figure 1: Location of MGM Brakes Superfund Site, showing monitoring wells and extend of groundwater contamination



What Does “Protectiveness” Mean?

When EPA declares that its selected remedy is protective, it means the current cleanup systems are functioning as intended by the decision documents, the public and the environment are not exposed to site contaminants, and no other information has come to light that could call into question the protectiveness of the remedy.

SITE BACKGROUND

From 1962 until operations ceased in 1982, the MGM Brakes facility manufactured and cast aluminum brake components for large motor vehicles. From 1965 to 1972 hydraulic fluids containing polychlorinated biphenyls (PCBs) were used in the casting machines. These hydraulic fluids leaked from the casting machines in the normal course of plant operations and were then collected and discharged to the ground adjacent to the casting plant. This practice resulted in PCB contaminated soil, buildings and equipment. Groundwater flows to the south-southeast and was contaminated at the site property boundary, and immediately adjacent to the site, with volatile organic compounds (VOCs). TCE is the only chemical that continues to slightly exceed MCLs in 2 wells - both of which are on property that is immediately adjacent to MGM's.

EPA's Cleanup Remedy

In September 1988, EPA issued a Record of Decision (ROD) selecting a remedy for both soil and groundwater contamination. The soil cleanup included excavation and off-site disposal of PCB-contaminated subsurface soil above 10 parts per million (ppm), demolition of the casting plant, and decontamination of PCB-contaminated equipment and materials. Contaminated surface soil (defined as the top 10 inches of soil) above 1 ppm up to 10 ppm was removed. This soil was placed in the excavation for the contaminated subsurface soils prior to backfilling the area with clean imported fill material.

The groundwater remedy included activities to locate the source of VOCs, installation of additional wells to evaluate the extent of VOC contamination, and groundwater monitoring. The ROD provided for additional cleanup measures, if needed, to ensure that groundwater was restored to Safe Drinking Water Standards, known as Maximum Contaminant Levels or MCLs.

In May 1990 the owners of the site, TBG, Inc., and Indian Head Industries, Inc. entered into a legal agreement called a Consent Decree with EPA in which they agreed to implement the cleanup plan.

The soil, building and equipment cleanup was completed in June 1994. Trichloroethylene (TCE) is the only chemical that continues to exceed MCLs in two groundwater monitoring wells. Therefore, groundwater is sampled on a semiannual basis to monitor the progress of natural chemical breakdown in achieving MCLs.

EPA Remedy Modification

While conducting the soil excavation work (approximately 140,600 square feet were identified for excavation), some bedrock was encountered that required modifications to the 1988 ROD. The ROD was modified through a 1995 Explanation of Significant Difference (ESD) which allowed PCB contaminated soil to be left in place if it was at least 15 feet below ground surface and contained less than 100 ppm of PCBs. This resulted in approximately 1,700 square feet of soil left in place.

The locations are noted in a Voluntary Covenant and Agreement which restricts excavation in these areas. The Voluntary Covenant was recorded in July 1995 with Sonoma County.

The ESD selected Monitored Natural Attenuation (MNA) as the groundwater remedy. MNA includes a variety of physical, chemical or biological processes that, under favorable conditions, act without human intervention to reduce the concentration of contaminants in groundwater.

Five-Year Review Process

The Five-Year Review process collects information about the performance of the remedy and evaluates the remaining level of contamination

which must be addressed. It includes:

1. A review of documents relating to site investigations and cleanup
2. A site inspection to evaluate conditions and gather ecological data
3. A Screening-Level Ecological Risk Assessment
4. A review of the appropriate and applicable regulations

Screening-Level Ecological Risk Assessment

The Screening-Level Ecological Risk Assessment (SLERA) consisted of a quantitative and qualitative evaluation of current site conditions, identification of existing and potential receptors, and an analysis of the potential impacts from site contaminants. The screening level evaluation concluded that there is little or no potential risk to ecological receptors that are currently using the site or may use the site in the future.

Regulatory Review

As required by the Superfund law, the 1988 ROD and the 1995 ESD identified Federal environmental laws that soil and groundwater cleanup are required to meet. The remedy is also required to meet State environmental laws, if they are more stringent than Federal environmental laws. These laws and regulations are referred to as Applicable or Relevant and Appropriate Requirements or ARARs. ARARs identified in the ROD and ESD were reviewed and it was determined that no significant changes have occurred in the regulations that would impact the protectiveness of the selected cleanup plans for soil and groundwater.

Five-Year Review Results

Both the soil and groundwater cleanup plans remain protective of human health and the environment as there is not exposure to site chemicals.

All soil cleanup actions have been completed, as mandated in the ROD, ESD and Consent Decree. Soil excavation, placement of clean fill and building demolition were completed to EPA's approval as documented in the March 25, 1998 Certificate of Completion. A Voluntary Covenant and Agreement, recorded with Sonoma County, restricts excavation of certain portions of the site.

Groundwater cleanup is ongoing. Concentrations of TCE in groundwater continue to decline through natural breakdown and the contaminated groundwater plume is not expanding. Two monitoring wells out of eleven have concentrations of TCE slightly above MCLs.

In order to insure that the remedy continues to be protective of human health and the environment a second Five-Year Review will be conducted within five years of completion of the first Five-Year Review Report, or by 2008.

For Further Information

The Five-Year Review is available at the following two locations:



**Sonoma County
Public Library**
Third & E Streets
Santa Rosa, CA 95404
(707) 545-0831

EPA Records Center
95 Hawthorne Street
San Francisco, CA 94105
(415) 536-2000

Other information regarding the MGM Brakes cleanup is also available.



Web Site Information

For more detailed site information, you may access EPA's Region 9 Web page at www.epa.gov/region9/waste/sfund

Questions

about the site may be directed to EPA's project manager, Janet Rosati, at 415-972-3165 or rosati.janet@epa.gov.

MGM BRAKES FIVE-YEAR REVIEW UPDATE

For more information, you may contact:

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or call the toll-free message line
(800) 231-3075
and your message will be returned.



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